

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
DAVID GRESS)
LUCILLE GRESS) CASE NO. 17-31460-DHW-13
Debtor(s).)

OBJECTION TO CONFIRMATION

Now comes MAX CREDIT UNION, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. The debtor has failed to provide evidence of insurance coverage as required 11 U.S.C. Section 1326(a)(4) on the collateral securing the loans of the movant, to wit: 2014 FORD ESCAPE.

2. The plan fails to provide an appropriate risk adjusted interest rate to be paid on the secured claim of this creditor as required by 11 U.S.C. Section 1325(a)(5)(B)(ii). The plan proposes to pay interest on this creditor's claim at a rate of 4.75%. The current prime rate of interest is 4.25%; therefore, an appropriate risk adjusted rate should be between 5.25% and 7.25%.

WHEREFORE, MAX CREDIT UNION, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

MAX CREDIT UNION

By: /s/ Leonard N. Math

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this July 1, 2017.

SABRINA L. MCKINNEY
Chapter 13 Trustee
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/s/ Leonard N. Math